

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

ARLIN M. ADAMS, Chapter 11 Trustee of  
the Post-Confirmation Bankruptcy Estates of  
CORAM HEALTHCARE CORPORATION,  
a Delaware Corporation, and of CORAM,  
INC., a Delaware Corporation,

Plaintiffs,

v.

DANIEL D. CROWLEY

Defendant

Case No. 04-1565 (SLR)

**JOINT MOTION FOR EXTENSION OF CERTAIN DEADLINES CONTAINED IN THE  
COURT'S APRIL 25, 2006 SCHEDULING ORDER**

Pursuant to Local Rule 16.5, the parties, through counsel, hereby respectfully move this Court for an Order amending the current Scheduling Order dated April 25, 2006 (docket no. 70) to extend certain deadlines.

This Joint Motion is based on the following grounds:

1. The parties are involved in related litigation in the District of Colorado, in which dispositive motions have been filed, or will be filed later this month, which may affect this action.
2. Counsel for Defendant Daniel D. Crowley are working diligently to review and synthesize the large quantity of documents produced in discovery in this case and to obtain through service of process and to schedule the depositions of many third-party witnesses.
3. Counsel for Arlin M. Adams, Chapter 11 Trustee of the Post-Confirmation Bankruptcy Estates of Coram Healthcare Corporation, a Delaware corporation, and of Coram, Inc., a Delaware corporation, are working diligently to respond to the requests for production and interrogatories by Mr. Crowley served on October 10 and October 17 respectively.
4. Accordingly, the parties have agreed that it is in their mutual interest, and in the

interest of efficiency, judicial economy, and justice, to extend certain deadlines set forth in this Court's April 25, 2006 Order as follows:

- a) All fact discovery shall be completed by **March 30, 2007**.
- b) Reports from retained experts under Rule 26(a) (2) on issues for which any party has the burden of proof due by **April 13, 2007**. Rebuttal expert reports due by **May 11, 2007**. Depositions of such experts to be completed on or before **June 1, 2007**.
- c) All summary judgment motions shall be served and filed with an opening brief on or before **June 22, 2007**. Briefing shall be pursuant to D. Del. LR 7.1.2. No summary judgment motion shall be filed more than **ten (10)** days from the above date without leave of Court.

5. The parties further agree that Plaintiff's responses to the aforementioned discovery requests shall be served on or before **December 8, 2006**.

6. The parties respectfully request that all other dates set pursuant to the Order dated April 25, 2006 remain the same, including the trial date of **September 17, 2007**.

7. **Local Rule 16.5 Certification:** Undersigned counsel certify that they have sent a copy of this Joint Motion to their respective clients.

Dated: November 3, 2006



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ARLIN M. ADAMS, Chapter 11 Trustee of  
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CORAM HEALTHCARE CORPORATION,  
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v.

DANIEL D. CROWLEY

Defendant

Case No. 04-1565 (SLR)

**[PROPOSED] ORDER GRANTING JOINT MOTION FOR EXTENSION OF CERTAIN  
DEADLINES CONTAINED IN THE COURT'S APRIL 25, 2006 SCHEDULING ORDER**

Upon consideration of the parties' Joint Motion for Extension of Certain Deadlines  
Contained in the Court's April 25, 2006 Scheduling Order, and for good cause shown, the Court  
hereby GRANTS the Joint Motion.

Accordingly, IT IS ORDERED that:

1. All fact discovery shall be completed by **March 30, 2007**.
2. Reports from retained experts under Rule 26(a) (2) on issues for which any party  
has the burden of proof due by **April 13, 2007**. Rebuttal expert reports due by **May 11, 2007**.  
Depositions of such experts to be completed on or before **June 1, 2007**.
3. All summary judgment motions shall be served and filed with an opening brief on  
or before **June 22, 2007**. Briefing shall be pursuant to D. Del. LR 7.1.2. No summary judgment  
motion shall be filed more than **ten (10)** days from the above date without leave of Court.
4. Plaintiff's responses to Defendant Daniel D. Crowley's First Set of Requests for  
Production of Documents and First Set of Interrogatories shall be served on or before **December  
8, 2006**.

5. All other dates set pursuant to the Scheduling Order dated April 25, 2006 remain the same, including that the jury trial in this matter is scheduled to commence on **September 17, 2007**.

DATED: \_\_\_\_\_

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HON. SUE L. ROBINSON  
CHIEF JUDGE, UNITED STATES DISTRICT COURT